To: Henning, Alan[Henning.Alan@epa.gov]; Croxton, Dave[Croxton.David@epa.gov]

From: Carlin, Jayne

Sent: Thur 9/10/2015 4:02:30 PM Subject: RE: 319 discussion with DEQ

You are correct on the different approaches. What I don't know is how we count the "restrictions" of the funds due to CZARA. Perhaps a waiver may be the best approach....

Jayne

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www.epa.gov/r10earth/tmdl.htm

yosemite.epa.gov/R10/ecocomm.nsf/Watershed+Collaboration/State+Tribal+NPS

From: Henning, Alan

Sent: Thursday, September 10, 2015 8:48 AM

**To:** Carlin, Jayne; Croxton, Dave **Subject:** 319 discussion with DEQ

Dave and Jayne,

Yesterday I met with Gene Foster and Koto Kishida to discuss options for meeting the "50%" spending guideline for DEQ's 2016 319 funding application. The guideline, as I understand it, requires the state to target at least 50% of their funding for project related work. In the past (not including this year) DEQ has generally spent more of its 319 dollars on staff. I think the staff/project spending ratio has been about 64/36 – rough estimate. Now, with the CZARA

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penalty, the challenge for the State to address the guideline may be even greater. I know there are a couple of possible options, i.e., a waiver, and an approach that counts some of the dollars spent on staffs' salary as "project" dollars when the staffs' time was spent on "project" related work. Over the next few weeks I will be looking into this issue.

As always, I appreciate your thoughts and insights on this issue. I will be talking with Cyd Curtis about this since she was, at one time, the Region 5 319 Coordinator for the State of Wisconsin. Wisconsin used the "accounting" approach to meet the guideline.

Alan

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